

# **EXHIBIT 70**

Page 1

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE NORTHERN DISTRICT OF GEORGIA  
3                   ATLANTA DIVISION  
4                   DONNA CURLING, ET AL.,         )  
5    )  
6                   Plaintiffs,                         )  
7    )  
8                   vs.                                     ) CIVIL ACTION NO.  
9    )  
10    )  
11                   BRAD RAFFENSPERGER, ET         ) 1:17-CV-2989-AT  
12                   AL ,                                    )  
13    )  
14                   Defendants.                         )  
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10                   THIS DEPOSITION CONTAINS INFORMATION DESIGNATED  
11                   CONFIDENTIAL SUBJECT TO PROTECTIVE ORDER  
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25                   VIDEOTAPED 30(b)(6) DEPOSITION OF RICHARD BARRON  
Reported by: Debra M. Druzisky, CCR-B-1848

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1 A. Just with Fulton County or all of it?

2 Q. All of it that's relevant, do you believe,  
3 to election administration --

4 A. Okay.

5 Q. -- representing companies that are  
6 involved in --

7 A. Sure.

8 Q. -- the manufacture or sale of election  
9 equipment.

10 A. Yeah. So I've been with Fulton County  
11 since June of 2013 as director. Prior to that I  
12 was with Williamson County, Texas as the elections  
13 administrator from February of '07 until June of  
14 2013.

15 I was with Hart InterCivic in 2006 for  
16 that entire year, from January 1st to the end of  
17 the year. Before that, I was with Sequoia Voting  
18 Systems from April of 20 -- April of 2004, I think,  
19 to the end of 2005.

20 And then from December of '99 until April  
21 of 2004, I was with Williamson Count -- or with  
22 Travis County elections as election management  
23 coordinator. And with Hart and Sequoia I -- Hart I  
24 was an account manager, with Sequoia I was a  
25 regional project manager.

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1           Q. I was just -- I was on the actual stage  
2 just before the actual printing. I was under the  
3 impression that the voter had some opportunity to  
4 look at the screen to look at their selection  
5 before the printing.

6                         Is that correct?

7           A. Yes.

8           Q. Okay. And then the B.M.D. prints a paper  
9 record; is that correct?

10          A. Yes.

11          Q. Describe for me what's on that paper  
12 record.

13          A. The selections that the voter made when  
14 the voter voted. And then what it -- when they hit  
15 "cast ballot," that's what prints out.

16          Q. And that record has a Q.R. code on it?

17          A. Does it have a Q.R. -- I don't even  
18 remember if it has a Q.R. code or a barcode. I  
19 don't know. It's got a Q.R. code or a barcode on  
20 it.

21          Q. What do you recall what's on a ballot  
22 produced by a B.M.D. voting machine in the Fulton  
23 County election in the year 2020?

24          A. I don't remember if it's a barcode or a  
25 Q.R. code. I think it's a barcode.

1           Q. Okay. And describe for the record, is the  
2 barcode something that a voter could read to des --  
3 to confirm whether or not that it would -- properly  
4 recorded their vote?

5           A. No.

6           Q. Okay. And is there a text portion of the  
7 ballot that's been printed as well?

8           A. Yes. The ballot is printed out for the  
9 voter to review, and it looks like a ballot, like a  
10 paper ballot.

11          Q. Okay. And then the paper ballot is walked  
12 over to a scanner?

13          A. Yes.

14          Q. And then fed into the scanner?

15          A. Yes.

16          Q. And then the vote is -- the ballot is  
17 stored electronically on the scanner?

18          A. Yeah. The record -- yeah, the ballot is  
19 read by the scanner, and then it drops into a  
20 ballot box and the record of that -- of those votes  
21 is recorded on the scanner in the on -- and there's  
22 a flash card in there to record or store all of it  
23 as well.

24          Q. Now, let's start with the poll pad. The  
25 poll pad is loaded by WiFi?

1 A. Yes.

2 Q. And those are -- that's a WiFi system  
3 maintained at the Fulton election center on English  
4 Avenue?

5 A. Yes.

6 Q. And how often do the poll pads have to be  
7 updated prior to an election so that the  
8 information reflected on them is current?

9 A. Oh, the bulk file is loaded on the  
10 Saturday before Election Day.

11 Q. Okay.

12 A. There are updates that are done, I think  
13 O.S. updates that are done on those in the -- maybe  
14 in the days leading up to it. The new -- I think  
15 there's going to be a new process coming soon where  
16 there's going to be every -- I think almost, not  
17 every day, but several days leading up to it the  
18 voter record is going to be updated so that the  
19 Saturday upload isn't as bulky, doesn't take as  
20 long.

21 Q. It's a logistical challenge to update  
22 everything on that Saturday before the election,  
23 isn't it?

24 A. Yes. Because, yeah, the State requires us  
25 to do something that's unnecessary, and it's,

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1       frankly, dumb what they ask us to do, which is to  
2       put the entire statewide voter file on the poll  
3       pads. There's no reason for it.

4                 And KNOWiNK can site -- can cordon off a  
5       boundary around your county to get around that, but  
6       they don't do it. The don't do it because the  
7       State won't let them.

8                 Q. Have you made this recommendation to them  
9       in the past?

10          A. I've mentioned it, I think, in  
11       conversation, but they don't care.

12          Q. Why don't they care?

13          A. Because they --

14                 MS. LAROSS: I object to the form of  
15       the question.

16                 THE WITNESS: They know best.

17          BY MR. KNAPP:

18          Q. Do they offer a reason why that approach,  
19       which would lighten the load on Fulton County's  
20       poll pad updating, isn't to their liking?

21          A. No.

22          Q. Now, how is the software on the B.M.D.s  
23       loaded?

24          A. It's updated with a U.S.B. stick.

25          Q. And where does that U.S.B. stick come

1 from?

2 A. That'll come from the -- we get all of our  
3 election files or election project from the State  
4 center for election systems.

5 Q. And do -- does Fulton County do any kind  
6 of scan or other inspection of those sticks to see  
7 whether or not they've been tampered with or  
8 contain any malware?

9 A. No. I mean, the county doesn't do that,  
10 no. We get those -- those are delivered -- either  
11 we pick them up ourselves or they are delivered by  
12 the State to us, and they're sealed, and then we  
13 use them from there. And they go to direct cust --  
14 the custody is from the State to the county.

15 Q. In the June 2020 election, when was the  
16 software updated into the B.M.D.s by this method?

17 A. Well, it would have -- I mean, that --  
18 it -- once we start logic and accuracy testing,  
19 that starts. I don't remember when the exact date  
20 would have been.

21 But it's usually the ballots are prepared  
22 sometime six to eight weeks, they're available six  
23 to eight weeks before the Election Day, and then we  
24 start doing logic and accuracy testing.

25 Q. In 2020 how many precincts were in Fulton

1       election center that touches the election  
2       equipment?

3           A.     No.

4           Q.     The poll pads?

5           A.     Well, yeah, the poll pads get connected to  
6       it. They get connected via Meraki devices, which  
7       are secure WiFi access points. And those are what  
8       the information from the bulk -- the bulk files  
9       transmitted through those and through a cache box,  
10      and then they go into the -- into the poll pads.

11          Q.     And you mentioned again the bulk file  
12       upload. What's that?

13          A.     That's -- the bulk file?

14          Q.     The bulk file upload is what you referred  
15       to, yes.

16          A.     That's the voter -- that's the voter list  
17       for the State, the statewide voter list. And it's  
18       updated with everyone who's voted early or  
19       requested an absentee ballot or returned an  
20       absentee ballot.

21          Q.     And when is that done?

22          A.     The Saturday before Election Day. But the  
23       poll pads aren't part of the voting system.

24          Q.     Correct. That's the check-in system;  
25       correct?

1           A. Yeah.

2           Q. Well, other than they create a card that  
3       then is taken and put into the B.M.D.s; is that  
4       correct?

5           A. Yes. Yeah, they have -- the only  
6       information on the card is that there's just -- it  
7       just gives you access to a ballot, a ballot style.

8           Q. Has Fulton County ever done an assessment  
9       or evaluation as to whether or not information on  
10      those cards is vulnerable or accessible to attack?

11          A. No. Not that I'm aware of.

12          Q. These -- is that metracall (Phonetically)  
13      devices? I'm sure I mispronounced it. Explain  
14      what they are and what function they perform.

15          A. Which devices?

16          Q. You -- they -- you said there were certain  
17      devices that --

18          A. Devices, they're just, they're basically  
19      WiFi access points, and I -- from my understanding  
20      is that they're much more secure than a normal WiFi  
21      access point.

22           I don't know if they encrypt the data. I  
23       don't know technically what it is. But they're  
24       used because they have, I think, much higher  
25       security standards with them. Other than that, I

1           a poll pad before it got to a polling place?

2           A.     No.

3           Q.     Is there any concern about protecting that  
4         delivery such that that doesn't happen?

5           A.     No. I mean, you -- we're handing -- we  
6         hand them out on Sundays to the poll managers, who  
7         have put them in, you know, they put them in their  
8         cars, either take them to the poll -- you know,  
9         it's the same -- it's probably a -- you know, I  
10        don't know.

11           I would assume that our delivery probably  
12         makes it a more direct process than having the poll  
13         managers come pick them up. But the process is  
14         just to hand them out on Sundays anyway to the poll  
15         managers.

16           Q.     Is that process common among the other  
17         metro counties?

18           A.     Yeah. I mean, I would -- it's common  
19         across the country for some sort of process along  
20         those lines to happen.

21           Q.     Okay. Let's go to topic number four:

22                   "Any execution or operational  
23         issues or challenges with Georgia's  
24         current election system, including any  
25         Fulton County 2020 or 2021 elections,

1 polling sites, there were too many machines plugged  
2 in to the same outlets for -- and were overloading,  
3 you know, the circuit on a certain -- a certain  
4 electrical circuit would get un -- overloaded. So  
5 yeah, that, that did happen.

6 As far as equipment issues, I don't -- I  
7 don't think there were really any issues with the  
8 B.M.D.s that were caused by the B.M.D.s. I think  
9 it was more just either electricity or just poll  
10 workers not understanding what they needed to do.

11 Q. Who was responsible for training the poll  
12 workers on this new equipment?

13 A. Johnny Harris and Blake Evans were.

14 Q. And what role, if any, did the Secretary  
15 of State play in preparing them to train these  
16 folks?

17 A. I mean, we all, we received training from  
18 Dominion in December on the equipment. And then we  
19 had to get -- I mean, it took us -- it took a lot  
20 for us to get the State to produce any kind of poll  
21 worker manual on the system.

22 I mean, we essentially had to bug the  
23 State, you know, kind of tell them, look, this, we  
24 think this is your responsibility to come up with a  
25 poll worker manual for the State. They didn't

1       really seem to have any sense of urgency about  
2       that.

3                 But other than that, I mean, the State was  
4       pretty hands-off when it came to the system. We  
5       got -- we got some short training with Dominion.  
6       They provided a basic poll worker manual. And then  
7       we had the big, thick Dominion manual, so we had  
8       to, you know, come up with a -- with a manual for  
9       training.

10               You know, fortunately, most of it was  
11       done -- we started training people before the  
12       presidential preference primary. But you know, we  
13       were -- during -- it was during early voting when  
14       we shut that election down, so most of the election  
15       workers didn't receive any in-person training. And  
16       that was really the main problem.

17               With the -- as far as the electrical, the  
18       State was -- had -- I think they, if I remember  
19       right, they had contracted with someone to go out  
20       and check electrical, they did -- to do an electric  
21       at survey at polling places. And I'm thinking it  
22       was all before the June election that they were  
23       supposed to have done that.

24               I know that after the June election Fulton  
25       County went out and we surveyed everything. We

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1 figured out which outlets in all of those polling  
2 places were the ones that had to be used so that  
3 poll workers would, you know, no longer have  
4 problems with electricity.

5 Q. How long did it take the State to prepare  
6 the poll workers manual?

7 A. I don't remember. I think we got it  
8 sometime in February, maybe the latter part of  
9 February in 2020, which was just weeks before  
10 the -- it was pretty close to when early voting  
11 started for the March election.

12 Q. Did the Secretary of State prepare Fulton  
13 County for the different burdens that would be on  
14 it as a result of using this new system that the  
15 State had elected to purchase?

16 MS. LAROSS: I object to the form of  
17 the question.

18 THE WITNESS: Did they prepare us?

19 BY MR. KNAPP:

20 Q. Yes.

21 A. You know, I mean, they provided the  
22 Dominion training. You know, with the pandemic the  
23 way it was, I'm not really sure -- you know, I'm  
24 not sure what could have been done at that point.

25 But you know, I mean, obviously looking

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1 State himself common to the other counties as well  
2 to your knowledge?

3 A. No.

4 MS. LAROSS: Objection to the form of  
5 the question.

6 THE WITNESS: Not from my  
7 conversations with other directors.

8 BY MR. KNAPP:

9 Q. And what did you learn from other  
10 directors about the pattern of communications their  
11 offices had with the Secretary -- with  
12 Mr. Raffensperger?

13 A. I just -- I mean, they told me that they,  
14 you know, some of them have had -- some of them  
15 have regular contact with him in some form or  
16 fashion. I don't know if it's phone calls or  
17 whatever.

18 But you know, they either will be invited  
19 to things or they will -- or they'll be, you  
20 know -- I don't know what -- on what occasions they  
21 speak to him, but it seems to me that there are at  
22 least some regular conversations that happen  
23 sometimes between him and some of the other  
24 counties.

25 Q. Do you have any understanding as to why

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1       the Fulton County experience was different than  
2       these other counties?

3           A.     I can speculate as to --

4           MS. LAROSS: Objection as to form.

5           THE WITNESS: -- that but, you know,  
6       that's -- all I can do is just speculate  
7       on it. So I only know him from, you know,  
8       what he says and what he has his people  
9       say about us and the adversarial  
10      relationship he likes to have with us.

11       So.

12      BY MR. KNAPP:

13           Q.     Is the adversarial relationship helpful to  
14       your mission to conduct elections within Fulton  
15       County?

16           A.     No.

17           MS. LAROSS: Objection as to form.

18           THE WITNESS: No. But I also think  
19       the whole set-up in Georgia, which is --  
20       seems to be unique to Georgia, is -- just  
21       creates that atmosphere, the State  
22       Election Board, the investigations of the  
23       counties, the punitive punishments from  
24       the State Election Board, binding things  
25       over to the attorney general, these types

1 of things.

2 I mean, you know, the other states in  
3 which I've worked, you know, the Secretary  
4 of State's office is there as a helpful  
5 resource to the counties. And you  
6 definitely -- I don't think you can say  
7 that is the case in Georgia.

8 And I think the State Election  
9 Board's relationship with the counties is  
10 nothing but adversarial. And it's -- you  
11 know, I don't know what you want to call  
12 it. They're like kangaroo court sessions.  
13 But that's, you know, here in Georgia  
14 that's -- you just have to deal with it.

15 BY MR. KNAPP:

16 Q. And do you have specific examples of such  
17 dealings with the Secretary -- the State Election  
18 Board in Fulton County?

19 A. Well, I think, you know, you -- your -- a  
20 complaint comes in, an investigator does a  
21 complaint, they present it at the State Election  
22 Board. Sometimes you get notice a week ahead of  
23 time of what's coming.

24 You don't even -- you might not even have  
25 any records left because every two years you

1       election went extraordinarily well, even better  
2       than November.

3           Q.     One could almost say flawless.

4           A.     Yeah.

5           Q.     And again, talking about new procedures,  
6       had there ever been an R.L.L. -- R.L. audit of an  
7       election before, of a presidential election?

8           A.     We -- no. I mean, we had done a pilot of  
9       a -- of an R.L.A., and it was pretty simple. And  
10      we were set up to -- you know, we were going to --  
11      we were told by the State that they were going to  
12      pull about 250 to 275 ballots for our risk-limiting  
13      audit for the November election, and then it turned  
14      out we had to count every one by hand.

15           Q.     Are those the kind of surprises that gives  
16      you, people like you a nightmare?

17           A.     What, a full -- a full hand count of an  
18      election?

19           Q.     Well, after expecting an R.L.A. of only  
20      270,000 votes to suddenly ramp up to have to count  
21      every vote?

22           A.     Well, I mean, it wasn't --

23                  MS. LAROSS: Object to the --

24                  THE WITNESS: We weren't --

25                  MS. LAROSS: -- form of the question.

1                   Excuse me, Mr. Barron. Go ahead.

2                   THE WITNESS: Yeah, no, it was like

3                   275 ballots we were going to have to

4                   count.

5 BY MR. KNAPP:

6 Q. Oh.

7 A. And we had to count 527,000. So yeah, it  
8 was a -- it was stunning. Especially knowing that,  
9 even if we did that hand count, that with the  
10 margin of victory that Biden had we were going to  
11 have to do the machine recount anyway, and that  
12 Trump would request the machine recount even though  
13 we just did the hand count, it just seemed to me to  
14 be a complete waste of resources.

15                   It cost us almost 900,000 dollars, I  
16 think, to do that hand audit.

17 Q. Who ended up paying that?

18 A. The County.

19 Q. And then let's see here.

20 A. And the tool that we were given to record  
21 all the counting was just -- I -- it can't be  
22 termed as anything but a complete joke.

23 Q. Explain what those tools were, and explain  
24 what would be a much more legitimate and -- way to  
25 go about that task.

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1           A. Well, we got a piece of software called  
2 Arlo. And it was not built for this. You -- we  
3 were only given one user, permission for one user.  
4 And so every county got permission for one user no  
5 matter the size. And we had to enter all of the  
6 batch sheets.

7                 After somebody -- after teams of two would  
8 count, they would turn in a batch sheet with their  
9 totals on it, and those would have to be entered.  
10 And when you would enter it, the system would just  
11 spin like it -- you know, like, when Apple has the  
12 little twirly --

13           Q. Hourglass?

14           A. (Inaudible due to cross-talk).

15           Q. Uh-huh.

16           A. It will -- it just will be non-responsive.  
17 And so somebody would just enter the information  
18 again without realizing that the system had already  
19 probably accepted the previous entry.

20                 And there was also no search feature in it  
21 unless -- the only way you could search for  
22 something is if you -- you had to know how the  
23 batch number and the description was entered  
24 previously.

25                 And if you -- if you didn't know whether

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1       it was upper case or lower case, if you just put in  
2       all lower case and it had been entered upper and  
3       lower, you would not get anything out of your  
4       search result.

5                   So trying to go back and do any  
6       reconciliation was almost impossible. I mean, we  
7       finally just had to -- it was just not built for --  
8       that system was not built for what -- for the  
9       purposes for the counties to use it for a hand  
10      audit.

11     Q.    This was --

12     A.    So it was very hard to record all of the  
13       information afterwards. It would have been better  
14       just to do an express -- an Excel spreadsheet.

15     Q.    Interesting.

16                   Who selected the software?

17     A.    The State.

18     Q.    What input, if any, did they ask of you or  
19       your office in making that selection?

20     A.    I don't think they consulted with any  
21       counties on it. That's from what I've been told  
22       from other counties.

23     Q.    Do you have any understanding why they  
24       thought this tool would be sufficient to perform  
25       this task?

1 Q. Okay. Are we ready?

2 A. Yes.

3 Q. As you see, exhibit -- topic nine starts  
4 on Page 7, carries over to Page 8. Tell me, what  
5 knowledge, if any, do you have of any evaluation,  
6 study, investigation or assessment of the  
7 integrity, security or vulnerability of the  
8 Georgia's current election system or its prior  
9 G.E.M.S./D.R.E. election system?

10 A. This is at the top of number nine? This  
11 is topic number nine, you said?

12 Q. Yes, sir.

13 A. Hello?

14 Q. Yes. Can you not hear me? It's the  
15 top -- topic number nine in the paragraph, full  
16 paragraph at the top of number nine.

17 A. Oh, the paragraph before number nine?

18 Q. No. The actual -- well, it's all -- it's  
19 all one and the same. The paragraph is part of  
20 Paragraph 9, and then it then goes on to have  
21 additional Subparts A through D.

22 A. Okay.

23 Q. It's now highlighted by Mr. Sparks -- and  
24 I appreciate that -- in blue, it looks like.

25 A. Any testing, examination, re-examination,

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1 evaluation, study, analysis, investigation of the  
2 security, integrity, rely -- have we done any of  
3 these things?

4 Q. That's --

5 A. No.

6 Q. -- the question.

7 A. No.

8 Q. To your knowledge has the Secretary of  
9 State's office done any of these things?

10 A. I don't know.

11 Q. To the best of your knowledge, do you know  
12 if the Secretary of State has retained any outside  
13 party to engage in any of these activities?

14 A. Not that -- not of which I'm aware. I  
15 mean, I've heard that some legislatures -- well,  
16 and some legislators have brought in some different  
17 voting system vendors that were up for the -- that  
18 were under consideration with the S.A.F.E.  
19 Commission and that they've brought them in since  
20 the November election.

21 Q. Are you familiar with any evaluations or  
22 work performed for the Secretary of State by  
23 Fortalice?

24 A. No. I've heard the name, and I think -- I  
25 think, and I don't remember where it was from, it

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1       was -- I think it had to do with something on a --  
2       with a computer that they may have looked at at  
3       some point, but I'm not familiar with them.

4           Q.     In the -- in this suit Alex Halderman  
5       of -- one of the leading experts on voting systems,  
6       examined the system and found vulnerabilities.  
7       Have you ever seen that report?

8           A.     I've seen one report that was, like,  
9       authored in -- no, it was -- I don't think it was a  
10      report. I've seen something that he wrote for the  
11      Court in 2019. That's the only thing that I'm --  
12      of which I'm aware.

13          Q.     Okay. And do you recall what it is that  
14      Dr. Halderman said in that report that was provided  
15      to the Court?

16          A.     It seems like it was basically warning  
17      about what he considered to be some of the  
18      potential vulnerabilities of the system.

19          Q.     And at this point in time, were the -- was  
20      the system the D.R.E. system?

21          A.     No. I think it was considering the new  
22      voting system. And I don't -- I don't know if when  
23      he wrote that that the State had already decided  
24      upon Dominion's system. That may have been right  
25      after they -- the State purchased Dominion.

1           I can't re -- I don't know the exact date  
2       in which he submitted that to the Court, but it  
3       seemed as though it was pointing out things  
4       specific to Dominion.

5           Q.   Do you agree or disagree with the various  
6       elements that Dr. Halderman set forth in that  
7       report that he, in his view, deemed to be  
8       vulnerabilities?

9           A.   Not -- well, in whatever it was that I  
10      read that he wrote in 2019, I don't -- I can't  
11      remember what they call those, it wasn't -- they  
12      weren't interrogatories. It was more of like a --  
13      I can't remember what legal statement it was, but  
14      it was, like, 11 pages long.

15           Q.   Like an affidavit?

16           A.   Yeah. Maybe that was it. I didn't really  
17      find anything of concern in what he wrote. Because  
18      it just seemed like he was speculating on things  
19      that could possibly happen if this, this, this and  
20      this were in place, you know.

21           To me it was -- you know, it wasn't  
22      anything that caused me concern. But if he's  
23      written something since then, I don't know to what  
24      you're referring.

25           Q.   Okay. And would it be correct to assume

1           that you've not read any recent affidavit from  
2           Dr. Halderman that's different from the 2019  
3           affidavit that you believe you saw?

4           A.     I don't think so. I mean, I don't know  
5           what you mean by "recent." But I would say if it  
6           was within the last year, definitely I haven't read  
7           it. I have not read anything. And if it was in  
8           2020, I'm not sure how much I would -- how much  
9           attention I would have paid to it or remembered  
10          from it.

11          Q.     Do you think it's prudent for Fulton  
12         County, or for that matter the State of Georgia, to  
13         periodically make an attempt to have an outside  
14         service to assess whether or not the system has any  
15         vulnerabilities?

16          A.     Do I think it would serve a purpose for  
17         the State to have somebody come in and look at it?

18          Q.     Yes.

19          A.     No. I mean, not -- I don't know. I just  
20         don't -- you know, from what I've seen of the  
21         system, you know, yeah, it's got -- it's two --  
22         it's expensive and it costs too much money, and  
23         it's put an unfunded mandate upon all the counties.

24           I think if you talk to all the big  
25         counties, they're going to tell you -- not, maybe

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1 think -- yeah, I would -- but I don't -- I mean, I  
2 find it kind of hard to speculate on this stuff.

3 Q. Well, you've been hearing a lot of  
4 theories for a long time; right?

5 A. Yeah. Maybe my problem is that I seem to  
6 trust the people or my colleagues in my county and  
7 other counties that, you know, they're going to do  
8 the right thing. Maybe anymore after 2020 that's  
9 naive, but.

10 Q. I understand that you're no longer the  
11 executive director in Fulton County; is that  
12 correct?

13 A. I am until April 1st.

14 Q. Okay. Do you anticipate staying in the  
15 industry?

16 A. No.

17 Q. May I, if it's not too intrusive, may I  
18 ask why not?

19 A. Well, I don't, I mean, I don't really want  
20 to deal with -- I mean, most -- some of it has to  
21 do with personal life matters, and some of it has  
22 to do with I don't have really much respect for the  
23 elected officials involved in these things anymore.

24 I mean, you know, I've got -- there seems  
25 to be a big group of elected officials out there

1           B.M.D.s used in Fulton County for 2020  
2           and 2021 elections."

3           We've talked a little bit about the screen  
4           on the B.M.D.s and different systems as to whether  
5           or not, when a paper is printed, whether you can  
6           compare that back to the what was on the screen in  
7           terms of a voter verifying that the paper that's  
8           been generated by the B.M.D. is an accurate  
9           portrayal of their vote.

10           Do you have any other opinions about  
11          whether or not the B.M.D. produces a paper -- a  
12          record that a voter can verify?

13           A.     Do I have what about the voter record that  
14          could be verified?

15           Q.     Whether the voter can verify that their  
16          individual vote has been accurately recorded by the  
17          election system.

18           A.     You mean do I -- do I have any views on  
19          whether or not the voters -- can you restate, like,  
20          the -- a question?

21           Q.     I'll be glad to. I'm sorry. It was  
22          probably obtuse.

23           Are you aware of any policies implemented  
24          by Fulton County to ensure that the voters can  
25          verify that the paper ballot generated by the

1 system accurately records their vote?

2 A. No. I mean, we don't have anything in  
3 place that says, you know, voters need to -- you  
4 need to have the voters, make sure the voters  
5 verify what's on their ballot before they deposit  
6 it into the scanner.

7 I mean, I think we train poll workers to  
8 remind, you know, voters that they can -- you know,  
9 to follow the instructions that are on the screen,  
10 and before they -- before they put their ballot  
11 into a scanner, you know, if they -- if they're  
12 unsure that they received the correct ballot, to  
13 make sure a poll worker is aware of that before  
14 they deposit their ballot in the scanner.

15 Once you put your ballot into a scanner,  
16 the -- you know, you've cast it. But we don't do  
17 anything actively to tell voters they have to  
18 review their ballot for -- to see if it was  
19 correct.

20 Q. You're aware that the actual vote is  
21 embedded into whatever the, we didn't know whether  
22 it was a Q.R. code or just a barcode on the paper  
23 that's printed by the B.M.D.; correct?

24 A. Yeah.

25 Q. And so --

1           A. Yeah, there's no way for the voter to  
2 verify what's in that. So you know, they just have  
3 to -- they're supposed to review their ballots  
4 before they put it into the scanner. I mean, I  
5 don't know -- I know Alex Halderman did something  
6 where he -- it's, like, less than 10 percent of the  
7 voters actually do that.

8           That's probably even in line with what --  
9 and when I was part of the team that put the system  
10 in in Nevada with the VVPATs, you know, most people  
11 didn't look -- didn't really spend much time  
12 comparing their ballot to the -- what was under the  
13 glass.

14           And a lot -- most of them would say, well,  
15 we live in Nevada, if somebody's going to try to  
16 hack in and steal something, it's not going to be  
17 the votes, it's going to be the money, you know.  
18 Really, I mean, I mean, it was a lot of voters in  
19 Nevada would say that.

20           Q. Well, maybe we don't have as vulnerable of  
21 money here, that's why voters are more concerned.

22           And do the same concerns carry over to  
23 whether or not the paper that's printed by the  
24 B.M.D.s can actually be audited, whether it's a  
25 risk-limiting audit or actual recount given the

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1           Q.R. -- the code, whatever it is, is where the  
2       vote's embedded and not the text at the bottom of  
3       the ballot?

4           A.     You mean does it -- is it a concern for me  
5       that what's in the code, the code is not the same,  
6       the Q.R. code is not -- may not be the same as  
7       what's printed, the bubbles on the --

8           Q.     Yeah.

9           A.     -- his mark is not in the bubbles, there's  
10      no way for the voter to verify those two things?

11          Q.     Yeah. That those two things express the  
12      same vote.

13          A.     I mean, I think that with you -- if you do  
14      a risk-limiting audit, you should be able to verify  
15      that. I know some people have different views on  
16      what -- how extensive the audit needs to be to  
17      verify that.

18                  And I don't have a problem with more  
19      extensive audit, you know. I don't know. I mean,  
20      I guess if you get rid of the Q.R. code and barcode  
21      and you use a sys -- oh, I just got a message on  
22      my -- can you guys hear me?

23          Q.     Yeah.

24          A.     Okay. I, you know, I guess it would be --  
25      the best thing to do would be for there to be

1 minimal barcodes or Q.R. codes, and then whatever  
2 is on the ballot gets scanned somehow, just the  
3 content of the ballot. But I don't know what's  
4 involved in that.

5 Q. Are you aware that Dominion can provide  
6 "ballot on demand" printers?

7 A. That they can provide "ballot on demand"  
8 printers? Oh, you mean, like, for early voting  
9 locations?

10 Q. Or any application within either early  
11 voting or the actual Election Day in-person voting.

12 A. No, it doesn't surprise me that they can  
13 do that.

14 Q. And --

15 A. Yeah, I think I knew that.

16 Q. And if the State elected to add this to  
17 the current system, that the poll workers could  
18 print a ballot, a paper ballot for each voter when  
19 they check in?

20 A. And then have them mark it?

21 Q. Yeah. Then you could -- then you could  
22 have them mark it, you wouldn't have to have  
23 pre-printed ballots ahead of time, but it would  
24 allow the voter to use a hand-marked paper ballot  
25 and then -- to use that and deposit that into the

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1 R E P O R T E R C E R T I F I C A T E  
2 STATE OF GEORGIA )  
3 COBB COUNTY )  
4

I, Debra M. Druzisky, a Certified Court  
Reporter in and for the State of Georgia, do hereby  
certify:

That prior to being examined, the witness  
named in the foregoing deposition was by me duly  
sworn to testify to the truth, the whole truth, and  
nothing but the truth;

That said deposition was taken before me  
at the time and place set forth and was taken down  
by me in shorthand and thereafter reduced to  
computerized transcription under my direction and  
supervision. And I hereby certify the foregoing  
deposition is a full, true and correct transcript  
of my shorthand notes so taken.

Review of the transcript was requested.  
If requested, any changes made by the deponent and  
provided to the reporter during the period allowed  
are appended hereto.

I further certify that I am not of kin or  
counsel to the parties in the case, and I am not in  
the regular employ of counsel for any of the said  
parties, nor am I in any way financially interested  
in the result of said case.

IN WITNESS WHEREOF, I have hereunto  
subscribed my name this 14th day of February, 2022.



20  
21 Debra M. Druzisky  
22 Georgia CCR-B-1848  
23  
24  
25

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1 R E P O R T E R D I S C L O S U R E  
2 DISTRICT COURT ) DEPOSITION OF  
3 NORTHERN DISTRICT) RICHARD BARRON  
4 ATLANTA DIVISION )

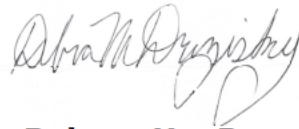
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6 Regulations of the Board of Court Reporting of the  
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17 Debra M. Druzisky  
18 Georgia CCR-B-1848  
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